



Benjamin Wolverton
+1 212.836.7971 Direct
Benjamin.Wolverton@arnoldporter.com

December 12, 2023

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Re: *Accent Delight International Ltd. v. Sotheby's et al.*, 18 Civ. 9011

Dear Judge Furman:

We write respectfully on behalf of Defendants Sotheby's and Sotheby's, Inc. pursuant to Section 7(C)(iii) of Your Honor's Individual Rules and Practices in Civil Cases and paragraph 4.5 of the February 28, 2020 Amended Protective Order (the "Protective Order"), *see* ECF No. 145 ¶ 4.5, to request permission to file under seal Defendants' supplemental briefing on its motions *in limine*. Defendants will publicly file a redacted copy of their brief contemporaneously with the sealed version.

Defendants' brief contains information that Plaintiff and Sanford Heller have designated as Confidential under the Protective Order. Defendants take no position on whether they should remain filed under seal.

Pursuant to Section 7(C)(i) of Your Honor's Individual Rules and Practices in Civil Cases, Plaintiff and Sanford Heller must file, within three business days, a letter explaining the need to seal and redact Defendants' filing if they contend that the filing should remain under seal and in redacted form on the public docket.

We thank the Court for its consideration of this letter.

Respectfully,

/s/ Benjamin C. Wolverton
Benjamin C. Wolverton

cc: All counsel of record (via ECF)